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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No.: 16-10015-A-9

Chapter 9

Doc. No. KDG-1

Date: To Be Scheduled
Time: To Be Scheduled
Place: Dept. A, Courtroom 11
U.S. Bankruptcy Court
2500 Tulare St.
Fresno, CA 93721

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**REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM OF
HEALTHCARE CONGLOMERATE ASSOCIATES, LLC ARISING OUT OF
REJECTION OF EXECUTORY CONTRACT (11 U.S.C. §§ 503(b) AND 507(a)(2))**

NOTICE IS HEREBY GIVEN that HEALTHCARE CONGLOMERATE ASSOCIATES, LLC ("HCCA") hereby asserts an Administrative Expense Claim (the "Claim") in the total amount of \$2,524,054.00, pursuant to 11 U.S.C. §§ 503(b) and 507(a) (2), and represents the following:

1. This claim arises out of the rejection of that certain Management Services Agreement ("MSA") dated sometime in January of 2016, between HCCA and Southern Inyo Healthcare District (the "Debtor"). A copy of the MSA is attached hereto as Exhibit "A" and incorporated herein by reference.

2. On December 2, 2017, the Court made its *Order Approving Stipulation Re Rejection of HCCA Management Agreement* [Dkt. No. 382] (the "Rejection Order"). The Rejection Order approved that certain *Stipulation Re Rejection of HCCA Management Agreement* [Dkt. No. 377], which specifically preserved HCCA's right to contest allegations made in the *Debtor's Emergency Motion (1) for Authority to Immediately Terminate HCCA Management Agreement* [Dkt. No. 325], including the Debtor's allegations that the MSA is a prepetition contract.

3. The Rejection Order further provided that, Pursuant to Rule 3002(c)(4) of the Federal Rules of Bankruptcy Procedure, HCCA shall file any claim arising from this rejection, including, but not limited to any claim or demand seeking administrative expense payments, no later than **January 31, 2018.**" (Rejection Order, Par. D).

4. The Claim is based upon the following items:

Unpaid Management Fees (See, Exh. B)	\$1,184,730.00
Unpaid Travel Expenses (See, Exh. C)	\$137,850.00
MSA Term. Fee Before Interest (See, Exh. D)	\$1,201,474.00
TOTAL	\$2,524,054.00

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1 5. Claimant reserves the right to amend this Claim and will set the matter for hearing
2 at a future date.

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4 Dated: January 30, 2018

KLEIN, DENATALE, GOLDNER, COOPER,
ROSENLIEB & KIMBALL LLP AND ORRICK,
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